

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SEAN G. FELDER,

Plaintiff,

-against-

CONTEMPORARY SECURITY SERVICES,

Defendant.

Civil No.:12-cv-07486 (PAC)(RLE)

**AFFIRMATION IN SUPPORT OF
APPLICATION TO WITHDRAW AS
COUNSEL**

Laurie E. Morrison, Esq., an attorney duly admitted to practice before this Court, affirms the truth of the following under the penalty of perjury:

1. I am the attorney of record for Plaintiff in the above-referenced case. As such, I am fully familiar with the facts and circumstances in this action.
2. I submit this affirmation in support of the instant application for an Order, pursuant to Rule 1.4 of the Local Rules of District Courts for the Southern and Eastern Districts of New York, permitting the Law Office of Laurie E. Morrison to withdraw as counsel for Plaintiff, effective immediately, and permitting Plaintiff a 60-day stay of the proceedings to obtain new counsel, together with such other and further relief as this Court deems just and proper.
3. In support of the instant application, I further submit the annexed Stipulation signed by all parties, including Plaintiff and counsel for Defendant, agreeing to my immediate withdrawal as counsel and to a 60-day stay of the proceedings.
4. Please note that the attached Stipulation lists an execution date of April 16, 2014. This date is a minor error. The Stipulation was fully executed on May 16, 2014, not April 16th.

5. This is an action for alleged employment race, ethnicity and color discrimination and retaliation against Defendant.

6. Plaintiff filed the instant action, *pro se*, in the Southern District of New York on October 4, 2012. Plaintiff subsequently filed an Amended Complaint, *pro se*, on January 16, 2013.

4. Plaintiff did not retain my services until fourteen months later on March 13, 2014. Plaintiff retained my services to appear in the parties' initial conference on March 17, 2014 and to represent Plaintiff in the case.

5. By the time that Plaintiff retained my services no discovery had occurred and there were no pending motions.

6. Within two weeks of being retained as Plaintiff's counsel, Plaintiff and I realized that I could no longer represent Plaintiff for business reasons.

7. I forwarded Plaintiff the annexed Stipulation for my withdrawal as counsel via email in April, 2014. Plaintiff could not open the file via email, so I forwarded Plaintiff the Stipulation via first-class mailing for his review and signature.

8. Plaintiff returned the signed Stipulation to me via first-class mailing. I then forwarded the Stipulation to defense counsel on May 16, 2014. Defense counsel forwarded me the fully executed Stipulation on that same day.

9. Accordingly, I submit the herein application and supporting Stipulation to respectfully request that this Court Order that the Law Office of Laurie E. Morrison is permitted to withdraw as counsel to Plaintiff, effective immediately, and that the instant proceedings are stayed for 60 days so that Plaintiff may retain new counsel.

10. No previous application has been made for the relief requested herein.

WHEREFORE, it is respectfully requested that the within application be granted, together with such other and further relief as this Court deems just and proper.

Dated: New York, New York
May 20, 2014

By: _____
Laurie E. Morrison, Esq.